



WILTSHIRE
& GRANNIS LLP

March 1, 2013

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200, GN Docket No. 13-5

Dear Ms. Dortch:

On February 27, 2013, the undersigned spoke by phone with Michael Steffen, Wireline Advisor to Chairman Genachowski and, separately, to Lisa Gelb and Bill Dever of the Wireline Competition Bureau to discuss Vonage's above-captioned request for direct access to numbering resources.

During those phone calls, I reiterated the importance to Vonage of direct access to numbers, and urged the Commission to move forward with Vonage's requested waiver. I explained that the Commission should grant the waiver in a manner that will foster the success of efforts to establish IP interconnection arrangements that allow the provision of higher quality and less costly service. I further explained that any waiver should provide sufficient scope and certainty that other providers will have incentives to negotiate agreements to interconnect and exchange traffic with Vonage on an IP basis. Vonage described the volume and distribution of numbers it receives from its numbering partners, and explained how both the volume of traffic exchanged with a particular provider and geographic scope impact the incentive of that provider to enter into an agreement to exchange traffic on an IP basis.

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

cc: Lisa Gelb